

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

MARIE JAFFE, et al.

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Plaintiffs

:

vs.

:

Case No.: 8:20-CV-3453

ADVENTIST HEALTHCARE, INC. d/b/a
ADVENTIST HEALTHCARE SHADY
GROVE MEDICAL CENTER, et al.

:

:

Defendants

:

NOTICE TO PLAINTIFFS, THROUGH COUNSEL,
IN COMPLIANCE WITH SECTION 4-306 OF THE HEALTH-GENERAL
ARTICLE OF THE ANNOTATED CODE OF MARYLAND

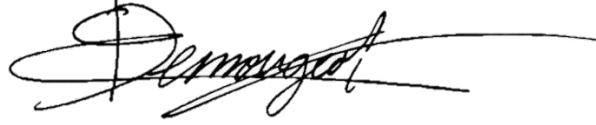
Take note that medical records regarding your client, **Marie Jaffe**, will be subpoenaed from the **Custodian of Records for Ivyrehab Physical Therapy, Bryan D. Springer, M.D., Christopher M. Polk, M.D., and Barry J. Hanger, M.D.**, pursuant to the attached Subpoena and §4-306 of the Health-General Article of the Annotated Code of Maryland.

Please examine these papers carefully. If your client(s) has/have any objection to the production of these records, you and/or your clients must file a Motion for Protective Order or a Motion to Quash the Subpoena issued for these records, pursuant to Maryland Rules 2-403 and 2-510, respectively, no later than thirty (30) days from the date this Notice is mailed. For example, a Protective Order may be granted if the records are not relevant to the issues in this case, the request unduly invades the patient's privacy, or causes the patient specific harm.

Attached to this Notice is a copy of the Subpoena and Notice of Records Deposition *Duces Tecum* that will be issued to the **Custodian of Records for Ivyrehab Physical Therapy, Bryan D. Springer, M.D., Christopher M. Polk, M.D., and Barry J. Hanger, M.D.**, for these records.

Respectfully submitted,

**ARMSTRONG, DONOHUE, CEPPOS,
VAUGHAN & RHOADES, CHARTERED**



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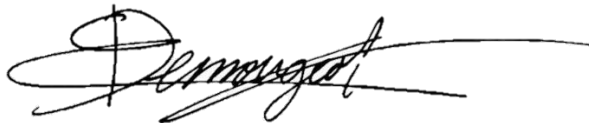
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of July, 2021, a copy of the foregoing Notice to Plaintiff(s), Through Counsel, in Compliance with Section 4-306 of the Health-General Article of the Annotated Code of Maryland, was electronically filed and served via first class postage prepaid mail, on:

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